



September 10, 2014

Chairman Tom Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O’Rielly
Federal Communications Commission
445 12th St, SW
Washington, D.C. 20554

RE: In the Matter of Connect America Fund - WC Docket 10-90

Dear Mr Chairman and Commissioners,

We submit this letter on behalf of the undersigned organizations, representing rural school districts, educational service agencies, communities and educators across the country. We write in response to the Federal Communication Commission's inquiry into the need to establish appropriate broadband speeds to meet the evolving needs of community anchor institutions, especially in rural areas.

While our organizations will not weigh in on the myriad topics raised in the Further Notice of Proposed Rulemaking, there is one issue that resonates very strongly with our members, and that is the issue of ensuring that our nation’s rural communities have access to broadband connectivity that is comparable to that of their urban and suburban counterparts. In particular, we point to paragraph 159, *Connections to Schools, Libraries, and Health Care Providers*.

Our schools and libraries have increasing demand for broadband connectivity, as schools are incorporating ever more connectivity-based applications and devices into their curriculum and teaching, and libraries serve patrons accessing multiple devices simultaneously. As our friends at SHLB/SECA wrote, “These organizations are large consumers of broadband and need significantly greater capacity than residential or small business customers, but their resources are far less than the typical enterprise.” (SHLB Coalition and SECA joint comments in this proceeding, p. 2)

Especially in our rural communities, anchor institutions like schools and libraries are uniquely positioned to offer connectivity to the community and to the public. While some rural areas have experienced increased connectivity over the last ten years, there is great room for improvement. The FCC’s recent release of school and library broadband maps demonstrate that our rural communities have yet to realize connectivity levels comparable to those of their urban and suburban counterparts. (www.fcc.gov/maps/E-rate-fiber-map)

Earlier in this proceeding, the FCC set an expectation that eligible telecommunications carriers (ETCs) will offer broadband to community anchor institutions in rural and high-cost areas and that they will

provide such offerings “at rates that are reasonably comparable to comparable offerings to community anchor institutions in urban areas.” To the extent that the Connect America Fund (CAF) continues to expand connectivity, we urge the FCC to require CAF fund recipients to serve anchor institutions. While the current language in the CAF urges CAF recipients to confer with anchor institutions when planning network design of CAF-supported infrastructure, it stops short of requiring any connectivity for these customers. It is our belief that CAF recipients should be required to serve community anchor institutions, including schools and libraries, with high-capacity broadband connections that reflect their service to the community as a whole. Because broadband connectivity in rural schools and libraries lags behind our urban counterparts, requiring CAF recipients to serve schools (and libraries) with high capacity broadband is necessary to accomplish the goals of the President’s ConnectED Initiative.

The simple switch from a suggestion to a requirement to offer high-bandwidth service for anchor institutions would represent a significant benefit to our rural communities as it relates to access to sufficient and affordable broadband services. It would represent a strong step in the right direction toward bolstering efforts to ensure that rural communities have services comparable to urban areas.

Sincerely,

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John Hill
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Lee Warne
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